



Carolina Telephone
Centel-North Carolina
Centel-Virginia
United Telephone-Southeast

James B. Wright
Senior Attorney

January 10, 2001

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

RE: Docket No. 00-00873 (Rulemaking Proceeding - Proposed
Amendments to Regulations for Telephone Service Providers -
Service Standards); Sprint's Comments - Workshop 1

Dear Mr. Waddell:

The January 4, 2001 Notice of Workshops established a series of workshops and a schedule for filing comments in the above case. BellSouth has filed comments for Workshop 1 topics which have been concurred in by industry members, including United Telephone-Southeast, Inc. and Sprint Communications Company L.P. (jointly "Sprint").

Sprint is enclosing for filing in the above proceeding the original and thirteen copies of Sprint's Written Joint Comments for those Workshop 1 topics not addressed in BellSouth's consensus filing.

Please contact me if you have any questions regarding this filing.

Sincerely yours,

A handwritten signature in black ink that reads "James B. Wright" followed by a stylized monogram "JW".

James B. Wright

Enclosures

cc: Industry Members (with enclosure)
Consumer Advocate and Protection Division (with enclosure)
Dennis Wagner
Laura Sykora
Kaye Odum

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

**Re: In the Matter of Notice of Rulemaking Amendment
of Regulations for Telephone Service Providers**

Docket No. 00-00873

**SPRINT'S ADDITIONAL SUGGESTED REVISIONS
TO PROPOSED SERVICE STANDARDS RULES**

Pursuant to the Order the Hearing Officer entered in this docket on December 15, 2000, Sprint Communications Company L.P. and United Telephone-Southeast, Inc. (jointly "Sprint") offers the following suggested revisions to the proposed rules to be addressed in Workshop I in addition to the Industry consensus comments.

1220-4-2-.01 Definitions

- (22) "Local Telecommunications Service Provider" means any provider of local exchange service as ~~defined in Tenn. Code Ann. §65-4-101(c)~~ and includes, but is not limited to, incumbent local exchange carriers ("ILEC"), competitive local exchange carriers ("CLEC") and resellers. To the extent that a telecommunications service provider provides interexchange services, that telecommunications service provider is not a local telecommunications service provider with respect to such services.

1220-4-2-.03 Records and Reports

(3) Out-of-Service Report

- (a) Eligible telecommunications carriers~~service providers~~ are required to notify the Authority ~~by the methods listed below~~ regarding disruptions of service when greater than 1000 customers lose service for greater than four (4) hours. In the event of such a disruption, the local telecommunications service provider shall

- ~~1. Contact the Authority within two (2) hours of the service disruption or if during non-work hours, at the beginning of the succeeding workday and provide the location of the disruption, number of customers affected, and estimated restoral time.~~
2. provide a written report within thirty (30) days of the incident to the Authority detailing the disruption along with actions the Local Telecommunications Service Provider has or shall take to prevent a similar disruption from occurring again.

(6) Wireline Reports

Until the Authority deems it unnecessary to continue doing so, each Local Telecommunications Service Provider shall provide to the Authority a summary of its wireline activity within the State on the first working day of each month quarterly in a format established by the Authority. This information shall allow the Authority to monitor the evolution of local competition within Tennessee. Because these reports contain confidential and competitively sensitive information, they shall be treated as Proprietary by the TRA and shall not be subject to public disclosure.

~~(7) Telephone Number Utilization Reports~~

~~Each Telecommunications Service Provider shall provide telephone number utilization data to the Authority on the forms provided by the Authority, as authorized by the Federal Communications Commission.~~

(109) Interruption of Service Reports

Each Eligible Telecommunications Carrier ~~Service Provider~~ shall maintain an accurate record of trouble reports made by its customers. This record shall include such information as the customer name, and the time, date and nature of the trouble along with the action taken by the Eligible Telecommunications Carrier ~~Service Provider~~ to clear the trouble or satisfy the complaint. This record shall be available to the Authority or its authorized representative upon request.

1220-4-2-.09

Directories (White Pages)

- (1) Telephone directories shall be published annually. Local telecommunications service providers shall regularly publish or cause to be published telephone directories which and shall contain at a minimum the name, address and telephone number of all customers, except public telephones and those customers who have informed the Local Telecommunications Service Provider to not list their information.

- (2) All local telecommunications service providers shall ~~provide~~ make available free of charge to ~~its~~ their customers a white page telephone directory ~~encompassing the local calling area for the area where the customer is located~~. Directories for areas outside the local calling area shall be ~~provided~~ made available to the customer for a reasonable cost.
- (3) ~~In the event of a Telecommunications Service Provider listing error or the omission of a customer listing, the Telecommunications Service Provider shall provide an intercept service along with directory assistance for all calls made to the omitted number, upon the request of the customer, for up to one (1) year at no charge or until the publishing of a new White Page Directory.~~
In the event of an error in the listed number of any customer, the telephone service provider shall intercept all calls to the listed number for a reasonable period of time, provided existing central office equipment will permit and the number is not in service. In the event of an error or omission in the listed name of a customer, such customer's correct name and telephone number shall be in the files of the information or intercept operators and the correct number furnished the calling party either upon request or interception.
- (4) The Authority's toll-free telephone number and Internet address shall be listed ~~on~~ in the inside cover front section of the directory. Local telecommunications Service Providers shall not charge the Authority for the listing of the above information.
- (5) A local telecommunications service provider shall provide the Authority, upon request and without charge, at least one (1) copy of its directories at the time of publication.
- (6) ~~The directory shall contain such instructions~~ Local telecommunications service providers shall provide local directory publishers with relevant information for publication concerning placing local and long distance calls, calls to repair, calls regarding billing questions as well as information services, and the mailing address of the local telecommunications service provider.
- (7) The area included in the directory along with the month and year of the issuance of or the intended period of use for the directory shall appear on the cover of the directory. Information pertaining to emergency calls such as for the police and fire department shall appear conspicuously in the front section of the directory.
- (8) Whenever any customer's telephone number is changed after a directory is published, the local telecommunications service provider shall intercept all calls to the former number for a reasonable period of time and give the calling party the new number unless instructed otherwise by the customer with the new number.

- (9) ~~Telecommunications service providers publishing White Page Directories must provide the opportunity to competitive local exchange carriers offering service within the calling scope of a directory to contract for the appearance of the competitive local service providers name and logo on the cover of such directories under the same terms and conditions as the telephone service provider provides to itself.~~¹

Respectfully submitted,
Sprint Communications Company L.P.
United Telephone-Southeast, Inc.

James B. Wright/jm
James B. Wright
Senior Attorney

¹ The Authority's prior orders regarding logo appearances on the cover of directories published on behalf of BellSouth have been stayed by the Court of Appeals. Sprint believes that this provision should not be included in the proposed rules as long as that stay remains in effect.